

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

Planned Parenthood of Tennessee and North
Mississippi; *et al.*,

Plaintiffs,

v.

Herbert H. SLATERY III, Attorney General
of Tennessee, in his official capacity; *et al.*,

Defendants.

CIVIL ACTION
CASE NO. 3:20-cv-00740
JUDGE CAMPBELL

**PARTIES' WITNESS LISTS AND
JOINT MOTION TO EXTEND DEADLINES**

The parties submit their respective witness lists below for the preliminary injunction hearing in this matter.

The parties further jointly request an extension of time to submit the parties' exhibit lists to Friday **November 20, 2020** and to extend the deadline for motions in limine, stipulations, deposition designations, and supplemental briefs to Tuesday **November 24, 2020**. In its Order on October 13, 2020 (Dkt. No 38), the Court set deadlines for filing Witness and Exhibit lists and supplemental affidavits on November 16, 2020 and for motions in limine, stipulations, deposition designations, and supplemental briefs on Monday November 23, 2020. The parties will not file supplemental declarations and do not anticipate filing deposition designations or supplemental briefs.

Due to scheduling conflicts, the last of the pre-hearing depositions is being conducted tomorrow Tuesday, November 17, 2020, and thus the parties believe it would be premature to commit to specific exhibits each intend to use at the hearing before all depositions are completed.

Plaintiffs' Witness List

Plaintiffs expect to call the following witnesses at the preliminary injunction hearing in this matter:

1. Courtney A. Schreiber, M.D., M.P.H.

Dr. Schreiber is expected to provide expert witness testimony consistent with her previously-submitted declarations on issues pertaining to, *inter alia*, the medicine and science of abortion care, including specifically medication abortion and mifepristone, as well as scientific research methods and study designs.

2. Steven Joffe, M.D., M.P.H.

Dr. Joffe is expected to provide expert witness testimony consistent with his previously-submitted declarations on issues pertaining to, *inter alia*, medical ethics and informed consent.

3. Audrey Lance, M.D., M.P.H.

Dr. Lance is expected to provide fact testimony concerning her opposition to Tenn. Code. Ann. § 39-15-218, as well as expert witness testimony consistent with her previously-submitted declarations on issues pertaining to, *inter alia*, the practice of abortion medicine and specifically medication abortion.

Defendants' Witness List

Defendants expect to call the following witnesses at the preliminary injunction hearing in this matter:

1. Brent Boles, M.D.

Consistent with his testimony before the Tennessee General Assembly and his previously-submitted declaration, Dr. Boles is expected to testify concerning, *inter alia*, his experience administering progesterone to pregnant patients, including patients who have initiated

a medication abortion by taking mifepristone (with an emphasis on Tennessee patients). Dr. Boles is also expected to testify concerning, inter alia, the administration of progesterone to pregnant patients, medical ethics, informed consent (from a practitioner's perspective), and scientific research methods and study results related to some of the relevant studies and articles. Dr. Boles is also expected to testify about the operation of the Abortion Pill Rescue Network and associated information related to progesterone treatment. Dr. Boles is expected to testify both as a fact and expert witness.

2. Donna Harrison, M.D.

Consistent with her previously-submitted declaration, Dr. Harrison is expected to testify concerning, inter alia, medical ethics, informed consent, scientific research methods and study designs, and the biological plausibility of avoiding, ceasing, or reversing the intended effects of a medication abortion through progesterone supplementation and the supporting results from relevant studies and articles. Dr. Harrison is expected to testify as both a fact and expert witness.

3. George Delgado, M.D.

Consistent with his previously-submitted declarations, Dr. Delgado is expected to testify concerning, inter alia, medical ethics, informed consent, scientific research methods and study designs, and the biological plausibility of avoiding, ceasing, or reversing the intended effects of a medication abortion through progesterone supplementation and the conduct and supporting results from relevant studies and articles. Dr. Delgado is also expected to testify about the operation of the Abortion Pill Rescue Network and associated information related to progesterone treatment. Dr. Delgado is expected to testify as both a fact and expert witness.

The parties respectfully ask the court to extend the deadline to submit the parties' exhibit lists to Friday **November 20, 2020** and to extend the deadline for motions in limine, stipulations, deposition designations, and supplemental briefs to Tuesday **November 24, 2020**.

Dated: November 16, 2020

Respectfully submitted,

By: /s/ Thomas H. Castelli
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on November 16, 2020, a true and correct copy of the foregoing was served on the Tennessee Attorney General's Office, counsel for all Defendants, via the Court's ECF/CM system.

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